

MARK F. HAZELWOOD, # 136521  
LAURA S. FLYNN, # 148511  
LOW, BALL & LYNCH  
505 Montgomery Street, 7th Floor  
San Francisco, California 94111-2584  
Telephone: (415) 981-6630  
Facsimile: (415) 982-1634

Attorneys for Defendant  
BAY AREA RAPID TRANSIT DISTRICT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

PATRICIA NASH,

Plaintiff,

vs.

BAY AREA RAPID TRANSIT DISTRICT, DOES  
1- 40,

Defendants.

NO. C 05 5307 VRW

**DECLARATION OF LAURA S.  
FLYNN IN SUPPORT OF  
STIPULATION FOR  
CONTINUANCE OF TRIAL  
DATE AND PRE-TRIAL  
DEADLINES**

I, LAURA S. FLYNN, declare as follows:

1. I am an associate with the law offices of Low, Ball & Lynch. We represent defendant Bay Area Rapid Transit District in this action. I have personal knowledge of the information contained below.

2. The trial date in this case is March 10, 2008. As of today's date, the parties have exchanged written discovery and have completed the depositions of a number of fact witnesses. However, the parties have not yet completed the depositions of the persons most knowledgeable from the Bay Area Rapid Transit District. The depositions are scheduled to take place towards the end of December. Due to the outstanding depositions, the parties have not yet been able to participate in a mediation. In addition, the ability to draft and/or oppose any dispositive motion has been hampered.

///

3. Based on the above, the parties request that the trial in this case be continued for approximately a month to April 14, 2008. A related stipulation and proposed order is being filed with this Declaration.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 16 day of December, 2007 at San Francisco, California.

  
LAURA S. FLYNN